



KINGDOM OF CAMBODIA
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**Permanent Mission of the Kingdom of Cambodia
to the United Nations and other International
Organizations in Geneva**

N^o 2026/04/340

The Permanent Mission of the Kingdom of Cambodia to the United Nations Office and other International Organizations in Geneva presents its compliments to the Office of the High Commissioner for Human Rights (OHCHR) and , with reference to the latter's communication dated 12 January 2026, has the honour to attach herewith Cambodia's comments on the report entitled "A Wicked problem-seeking human rights-based solutions to trafficking into cyber scam operations in South-East Asia".

The Permanent Mission would greatly appreciate it if the OHCHR could convey the abovementioned comments to its highest destination.

The Permanent Mission of the Kingdom of Cambodia to the United Nations Office and other International Organizations in Geneva avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 01 April 2026

Office of the High Commissioner for Human Rights
Geneva

**Cambodia's comments on the report entitled
"A wicked problem"- Seeking human rights-based solutions to trafficking
into cyber scam operations in South-East Asia**

Cambodia expresses its appreciation to the Office of the United Nations High Commissioner for Human Rights (OHCHR) for its initiative in preparing this report and for its valuable contribution to regional and international efforts to combat trafficking in persons in the context of cyber-enabled scams. Cambodia reaffirms its strong and unwavering commitment to addressing online scams and related transnational crimes, and to strengthening cooperation with OHCHR and all relevant partners.

In this context, Cambodia wishes to offer following comments on the report as follows:

On the Methodology Part, Cambodia proposes to deleted (~~strikethrough in red~~) and add comments (underlined in blue)

- Page 3: [...] this report was gathered primarily from trauma-informed monitoring conducted remotely with 19 victims (12 men, 4 women and 3 LGBTIQ+ individuals) between July and September 2025. Victims originated from Bangladesh, China, India, Myanmar, Sri Lanka, South Africa, Thailand, Viet Nam and Zimbabwe. They had been trafficked to carry out scam activities into scam centers in Cambodia, Lao People's Democratic Republic (Lao PDR), Myanmar, the Philippines and the United Arab Emirates (UAE) between 2021 and 2025.

On the Enforcement efforts, Cambodia proposes to add comments (underlined in blue)

- Page 7: ... In February 2025, the Prime Minister of Cambodia established a high-level multi-agency Ad Hoc Commission to Combat Online Scams under direct supervision of the Prime Minister. In July 2025, the Royal Government of Cambodia issued an executive order on the nationwide campaign to crack down online scams, leading to the arrest of over 5 thousand individuals from 24 nationalities, and sending over 170 masterminds from 8 nationalities to court (as of 31 December 2025). On 5 January 2026, the Royal Government of Cambodia issued a sub-degree on the Management of Safety and Security in Concentrated Residential Areas, aiming to expand security oversight of the residential compounds and

establish obligations and penalties for owners, managers and competent authorities who conceal foreigners illegally entering Cambodia.”

On the Global interventions, Cambodia proposed to add comments (underlined in blue)

- Page 10: “[...] Additionally, an increasing series of targeted sanctions have been imposed over the past two years against entities and individuals involved in scam operations including:
 - In September 2024, the US sanctioned Cambodian businessman LY Yong Phat and multiple entities over the scam compound.[...]
 - [...] In September 2025, the US imposed sanctions on nine individuals operating in Shwe Kokko, Myanmar under the protection of the already sanctioned KNA as well as four individuals and six entities in Cambodia.
 - In October 2025, the US in coordination with the UK sanctioned 146 individuals linked to the Prime Holding Group in Cambodia, including an indictment and forfeiture action against businessman Chen Zhi and the seizure of 127,000 bitcoins worth \$14 billion, in addition to issuing further sanctions on the financial services conglomerate Huione Group.” Along with this, Cambodia authorities launched investigations against Prine Group and Chen Zhi, Subsequent legal actions were taken against them, including his arrest and deportation to China on 7 January 2026. Among legal actions taken by Cambodian authorities against the Huione Group was the revocation of its operating license.

On the Torture and other cruel, inhuman or degrading treatment or punishment, Cambodia proposed to add comments (underlined in blue)

- Page 15: “Death in the compound were frequently mentioned by victims.[...] The discovery of the body of a young South Korean man in August 2025 was followed by witness testimony and physical evidence that he had been tortured to death in the compound. The perpetrators and masterminds involved in this case have been arrested for prosecutions in due process.”